

ANDERSON KILL P.C.

Attorneys and Counselors at Law

1251 AVENUE OF THE AMERICAS ■ NEW YORK, NY 10020

TELEPHONE: 212-278-1000 ■ FAX: 212-278-1733

www.andersonkill.com

Jerry S. Goldman, Esq.
Jgoldman@andersonkill.com
212-278-1569

Via ECF

October 17, 2023

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: In re Terrorist Attacks on September 11, 2001, No. 03-MDL-1570 (GBD) (SN); Jessica DeRubbio, et al. v. Islamic Republic of Iran, No. 1:18-cv-05306 (GBD) (SN); Horace Morris, et al. v. Islamic Republic of Iran, No. 1:18-cv-05321 (GBD) (SN); Audrey Ades, et al. v. Islamic Republic of Iran, No. 1:18-cv-07306 (GBD) (SN); Chang Don Kim, et al. v. Islamic Republic of Iran, No. 1:18-cv-11870 (GBD) (SN); Alexander Jimenez, et al. v. Islamic Republic of Iran, No. 1:18-cv-11875 (GBD) (SN); Cheryl Rivelli, et al. v. Islamic Republic of Iran, No. 1:18-cv-11878 (GBD) (SN); Gordon Aamoth, Sr., et al. v. Islamic Republic of Iran, No. 1:18-cv-12276 (GBD) (SN); Marinella Hemenway, et al. v. Islamic Republic of Iran, No. 1:18-cv-12277 (GBD) (SN); August Bernaerts, et al. v. Islamic Republic of Iran, No. 1:19-cv-11865 (GBD) (SN); Ber Barry Aron, et al. v. Islamic Republic of Iran, No. 1:20-cv-09376 (GBD) (SN); Jeanmarie Hargrave, et al. v. Islamic Republic of Iran, No. 1:20-cv-09387 (GBD) (SN); Paul Asaro, et al. v. Islamic Republic of Iran, No. 1:20-cv-10460 (GBD) (SN); Michael Bianco, et al. v. Islamic Republic of Iran, No. 1:20-cv-10902 (GBD) (SN); Nicole Amato, et al. v. Islamic Republic of Iran, No. 1:21-cv-10239 (GBD) (SN); Susan M. King, et al. v. Islamic Republic of Iran, No. 1:22-cv-05193 (GBD) (SN) – Response to October 11, 2023 Order ECF No. 9371

Dear Judge Netburn:

We write in response to Court's October 11, 2023 Order, ECF No. 9371 requesting that undersigned counsel file expert reports to support a request for economic damages against the Islamic Republic of Iran for the following 18 plaintiffs: Steven Paul Chucknick, Emerita De La Pena, John Joseph Doherty III, Patrick Thomas Dwyer, John E. Eichler, Timothy Joseph Finnerty, Carl Martin Flickinger, Michelle H. Goldstein, Joseph John Hasson III, William Jose Jimeno, Nancy Liz, Kathy Nancy Mazza, John McLoughlin, James Francis Murphy IV, Joseph Michael Navas, Keith Kevin O'Connor, Patrick John O'Shea, and Joanne Rubino.

New York, NY ■ Los Angeles, CA ■ Stamford, CT ■ Washington, DC ■ Newark, NJ ■ Philadelphia, PA

Anderson Kill P.C.

The Honorable Sarah Netburn
October 17, 2023
Page 2

Counsel has reviewed the original motion papers and believes that these reports were somehow cut off from Exhibit D to the Declaration of Jerry S. Goldman, Esq. dated June 23, 2023, ECF No. 9149. Accordingly, counsel has re-attached a complete copy of Exhibit D to a sealed version of this letter, including all subparts, that includes the requested expert reports.¹

The Court also requested that counsel review the table attached to the October 11, 2023 Order and (1) confirm that it lists the correct personal representative for each estate seeking a judgment, or (2) submit any corrections with citations to relevant docket entries. Undersigned counsel can confirm that the October 11, 2023 Order lists the correct personal representative for each estate seeking a judgment, except that the last name of the personal representative of Alex F. Ciccone is now Oliva (i.e. Stefanie Oliva, not Stefanie Ciccone). This name change was noted for Stefanie's individual claim, *see* ECF No. 8189 at ¶ 19. Undersigned counsel would request that the Court so order a corresponding name change for the estate claim to note that the personal representative's name is now Stefanie Oliva, not Stefanie Ciccone.

We thank the Court for its attention to this matter and apologize for the inconvenience.

Respectfully submitted,

/s/ Jerry Goldman
Jerry S. Goldman, Esq.

Attorney for the Plaintiffs

Enclosures omitted

Cc (via ECF): The Honorable George B. Daniels
All Counsel of Record

¹ The expert report for Joanne Rubino was inadvertently omitted from Exhibit D previously, but it is included here and in the accompanying index.